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and

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*Attorneys for Defendants,
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
 Individually and as Parent and Legal Guardian)
 of W.W., K.W., G.W., and L.W., minor children)
 and MATTHEW WADSWORTH,)

Plaintiffs,)

v.)

WALMART INC. and)
 JETSON ELECTRIC BIKES, LLC,)

Defendants.)

Case No. 2:23-cv-00118-NDF

**DECLARATION OF
 EUGENE M. LAFLAMME
 IN SUPPORT OF RESPONSE
 MEMORANDUM IN
 OPPOSITION TO PLAINTIFFS’
 MOTION TO EXCLUDE
 EXPERT TESTIMONY OF
 BRIAN STRANDJORD, PE**

I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.
4. The primary liability dispute between the parties is whether the fire originated at a Jetson Plasma hoverboard by the bedroom door of G.W. and L.W.'s bedroom or a smoking shed located outside the bedroom window of G.W. and L.W.
5. I attended the deposition of expert Brian N. Strandjord, PE, CFI, CFEI taken on November 27, 2024.
6. Attached as Exhibit 1 are the pertinent portions of expert Brian N. Strandjord's deposition taken on November 27, 2024.
7. Attached as Exhibit 2 is a true and correct copy of Preface to Kirk's, 8th edition.
8. Attached as Exhibit 3 is a true and correct copy of ATF Fire Laboratory, Technical Bulletin No. 2, Arc mapping as a tool for fire investigations (ATFFRL-TB-170001) March 17, 2017.
9. Attached as Exhibit 4 is a true and correct copy of International Association of Arson Investigators (IAAI) October 2020, Volume 7, Issue 2, Dr. Nick Carey, Ph.D. article, "Arc Mapping Research – a clarification".
10. Attached as Exhibit 5 is a true and correct copy ATF Fire Research Laboratory, Cameron Novak, "Letter to the Editor in Response to Arc Mapping: A Critical Review".
11. Attached as Exhibit 6 are the pertinent portions of May / Icove's 2020 "Arc Mapping Methodologies & the Pursuit of Magical Globules Notches & Beads: A Bridge too Far to Establish Fire Origin?"

12. Attached as Exhibit 7 is a true and correct copy Dr. Mark Svare, “Forensic Examination of Post-Fire Damaged Electrical Conductors by Using X-Ray Radiographs”, 2023.

13. Attached as Exhibit 8 is a true and correct copy Dr. Mark Svare, “Forensic Examination of Post-Fire Damaged Electrical Conductors by Quantitative Measurement”, 2023.

14. Attached as Exhibit 9 is a true and correct copy Dr. Mark Svare, “Development of a Systematic Methodology for Reconstructing the Fire Scene by Using The Electrical System”, 2024.

15. Attached as Exhibit 10 is a true and correct copy of NFPA 921 (2024 ed) sections 1.3, 6.6.1, and 6.6.8.3.

16. Attached as Exhibit 11 are the pertinent portions of expert Brian N. Strandjord’s report.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 16, 2024



Eugene M. LaFlamme